



Ontario
Home Builders'
Association

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Building and Development Branch
Ministry of Municipal Affairs and Housing
College Park 12th Floor, 777 Bay St, Toronto, ON M7A 2J3

Proposal Number: ERO 019-6211

RE: Proposed Changes to Sewage Systems and Energy Efficiency for the Next Edition of Ontario's Building Code

The Ontario Home Builders' Association (OHBA)

The Ontario Home Builders' Association (OHBA) is the voice of the residential construction industry in Ontario. OHBA represents over 4,000 members including builders, developers, professional renovators, trade contractors and many others within the residential construction sector.

Changes to Ontario's Building Code have a significant impact on the residential construction industry and ultimately the construction of new homes and housing attainability. OHBA supports technical alignments that allow for practical building standards which both ensure Ontario can continue to build safe homes, while not negatively impacting attainability at a time when the costs of construction continue to rise. Furthermore, OHBA strongly supports the principle that Ontario specific standards, particularly those which industry are highly familiar with and support, take precedent over any proposed National Building Code (NBC) changes as the process of code harmonization is underway. This will help ensure continuity in the residential construction sector and mean more stability for builders who rely on a predictable building code system to design and construct homes.

OHBA supports greater flexibility in sewage system technology that achieves modern performance and efficiency objectives. The proposed changes will have only minor implications on new home construction in rural and remote areas which do not have access to municipal servicing and infrastructure.

We thank the Ministry for the opportunity to comment on these proposals. We also recognize that there is still more work to do and OHBA may provide further comments at a later date. We look forward to continuing engaging with the Ministry in order to ensure these proposals are aligned with the goal of increasing housing attainability.